27°

IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

BARBARA A. WILHELM,

v.

Plaintiff

NO. 1:CV-01-1057

:

(JUDGE RAMBO)

COMMONWEALTH OF PA.; PENNSYLVANIA STATE POLICE; COLONEL PAUL J. EVANKO,

COMMISSIONER; LIEUTENANT

COLONEL THOMAS K. COURY; and CAPTAIN MICHAEL. D. SIMMERS,

Defendants

FILED HARRISBURG, PA

FEB 26 2003

MARY E. D'ANDREA, CLERK

Deputy Clerk

PLAINTIFF'S MOTION FOR INTEREST ON JURY VERDICT AND THIS COURT'S AWARD OF FRONT PAY

AND NOW, comes Barbara A. Wilhelm, Plaintiff, by and through her attorney, Nathan C. Pringle, Jr., to file her motion for interest on the jury verdict and this Honorable Court's award of front pay, and avers as follows:

1. On June 14, 2001, Barbara A. Wilhelm filed a complaint alleging she was dismissed in violation of Title VII of the Civil rights Act of 1964, as amended 42 U.S.C. § 2000 et seq., and the Pennsylvania Human Relations Act, 43 Pa. C. S. § 955.

- 2. On September 11, 2002, the jury selected to decide Ms. Wilhelm's case, found for her and awarded her \$250,000.00.
- 3. On February 5, 2003, this Court awarded Ms. Wilhelm an additional \$27,148.05 in front pay.
- 4. Under Pennsylvania law Ms. Wilhelm is entitled to interest from the date of the September 11, 2002 verdict until she receives payment.
- 5. Under Pennsylvania law Ms. Wilhelm is entitled to interest from the date of the February 5 2003 front pay award until she receives payment.
- 6. The rate of interest under Pennsylvania law is six per cent per annum.
- 7. Opposing counsel, Susan J. Forney, Esquire does not concur in this motion.

WHEREFORE, the Plaintiff respectfully requests that this Honorable Court grants her motion for an award of interest at the rate of six per cent per annum from the respective dates of the verdict and award until she receives payment.

Respectfully Submitted,

Nathan C. Pringle, Jr.

Attorney I. D. Number 30142 3601 North Progress Avenue

Suite 200

Harrisburg, PA 17110

(717) 909-8520

February 26, 2003 Attorney for Plaintiff

CERTIFICATE OF SERVICE

I, Nathan C. Pringle, Jr., hereby certify that on February 26, 2003, I caused to be delivered by first-class mail a copy of the Plaintiff's Motion Interest on the Jury Verdict and This Court's Award of Front Pay, and supporting brief upon the following:

Susan J. Forney Chief Deputy Attorney General Office of Attorney General Litigation Section 15th Floor, Strawberry Square Harrisburg, PA 17120

Nathan C. Pringle, Jr.